



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

May 2, 2016

Christine Handler
USDA, TEAMS Enterprise
Pacific West Area
800 Buchanan Street
Albany, California 94710

Dear Ms. Handler:

The U.S. Environmental Protection Agency has reviewed the USDA, Agriculture Research Service, revised draft Environmental Impact Statement regarding the U.S. Sheep Experiment Station Grazing project in Idaho, Dubois, Idaho (EPA Project Number 11-006-DOA). Our review was conducted in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The DEIS provides detailed information regarding the history of the experiment station and the series of analyses that have occurred to evaluate activities beginning with an Environmental Assessment in 2008. The most recent NEPA analysis involved a draft EIS in 2011, which EPA provided comments on (October 3, 2011). In our letter we identified concerns related to potential interactions between bighorn sheep and domestic sheep.

The revised draft considers five alternatives including current management, discontinuing grazing, and limiting grazing to specific allotments within the sheep station. While the USDA explored alternatives through various NEPA analysis, the agency has decided to select the No Action, Alternative 1, as the preferred alternative. The agency proposes to continue existing operations along with conservation measures outlined in the U.S. Fish and Wildlife Service's Biological Opinion (February 25, 2015) to manage activities at the site. The project also includes best management practices and ongoing monitoring to determine the effectiveness of design criteria.

We acknowledge that one of the allotments that we raised issues with due to its proximity and potential to impact bighorn sheep (Bernice allotment) is no longer utilized. The remaining allotments that have the potential to impact bighorn sheep are the Snakey-Kelly allotments. The DEIS states that removing these allotments (Alternatives 2 and 5) would not likely demonstrate an observable change in bighorn sheep condition, health, or population. We support the elimination of allotments that reduce the potential for disease spread and encourage the USDA to consider avoiding these areas and/or utilize monitoring and adaptive management to shift management if a downward trend in wildlife and/or range conditions exists.

The DEIS states the sheep station utilizes BMPs and adaptive management to address rangeland health and that these activities have resulted in a slightly upward trend. The DEIS provides information on the adaptive management plan for noxious weeds; however, the document does not include details about a plan for other aspects of rangeland health/wildlife (i.e., bighorn sheep and sage grouse). We recommend that the final EIS include information about adaptive management including: indicators, thresholds, and actions that would be taken to address issues if a threshold is reached. This will provide direction to aid sheep station staff in implementing additional management actions if needed.

Based on our review, we have assigned a rating of LO (Lack of Objection) to the revised DEIS. We appreciate the opportunity to review and comment on the revised DEIS. If you have any questions about our review, please contact me at (206) 553-1601, or by email at littleton.christine@epa.gov. Or you may contact Lynne Hood of my staff at (208) 378-5757, or by email at hood.lynne@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Lynne Hood" followed by a stylized flourish.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit